

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

MARK HALE, TODD SHADLE, and  
LAURIE LOGER, on behalf of themselves and  
all others similarly situated,

Plaintiffs

v.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, EDWARD  
MURNANE, and WILLIAM G. SHEPHERD,

Defendants.

Case No. 3:12-cv-00660-DRH-SCW

Judge David R. Herndon

Magistrate Judge Stephen C. Williams

**DECLARATION OF DON BARRETT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Don Barrett, am a member in good standing of the State Bar of Mississippi and a partner in the law firm of Barrett Law Group, P.A. I am Court appointed Class Counsel in the above-captioned action. I provide this declaration in support of Plaintiffs' Motion for Attorneys' Fees and Costs.


1. I have reviewed the time and expense records submitted by Barrett Law Group, P.A., in this litigation and attest that they are accurate.

2. I further attest that the billing rates used to calculate the lodestar reflect the customary billing rates of the timekeepers at the time the services were rendered.

3. A true and correct copy of Barrett Law Group, P.A. resume is attached as Collective Attachment A to this Declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 8, 2018, in Lexington, Mississippi.

A handwritten signature in blue ink, appearing to read "Don Barrett", is written over a horizontal line.

Don Barrett

**EXHIBIT A**

**BARRETT LAW GROUP, P.A.**  
**FIRM RESUME**

**Don Barrett**

Don Barrett is one of the preeminent trial lawyers in America and has achieved great success for thousands of clients. Mr. Barrett has been the leader of many large pieces of litigation including the Ford/Firestone MDL Litigation and the tobacco litigation that brought about the 1998 Master Settlement Agreement with the tobacco industry. Mr. Barrett was one of the focus points of the 2000 book *Assuming the Risk: The Mavericks, The Lawyers, And The Whistle-Blowers Who Beat Big Tobacco* by Michael Orey.

**Richard R. Barrett**

Richard Barrett practices in the areas of contract fraud, insurance litigation, oil and gas law, class actions, personal injury and environmental torts. He is a member American Bar Association and serves on that group's Toxic Tort Subcommittee. He was also a founding member of the Civil Justice Institute, which is a special task force in the Section of Litigation of the A.B.A. that provides solutions to current perceived problems with the present court system. He is also a member of The American Association for Justice, The National Trial Lawyers Association which has named him as one of the Top 100 Trial Attorneys in Mississippi for both 2010 and 2011, The Mississippi Bar Association, and Mississippi Association for Justice. He is currently responsible for both individual injury cases, as well as several mass tort cases, including cases with permanent injuries due to exposure to asbestos fibers and manganese gases from welding fumes. Mr. Barrett resides in Oxford, Mississippi, with his wife, Stephanie, and their son and two daughters. In 2007, Mr. Barrett formed his own firm, The Law Offices of Richard R. Barrett, PLLC, which became a founding part of the Barrett Law Group, PA.

**Katherine Barrett Riley**

Katherine Barrett Riley practices in the areas of personal injury, property, wills, estates, class actions and consumer fraud cases. She is currently serving as the city attorney for the cities of Lexington and Tchula, Mississippi, as well as the attorney for the Holmes County Board of Supervisors. Mrs. Riley played an active role during the trial of Avery v. State Farm, which resulted in one of the largest verdicts ever against an insurance company and the largest verdict in Illinois history. Mrs. Riley lives in Lexington, Mississippi, with her husband and two children.

**David McMullan**

David joined the firm in 2002 and focuses his practice on complex civil litigation, including class actions, insurance, environmental and natural resources law. David earned his undergraduate degree from Rhodes College, his law degree from the University of Mississippi School of Law and his Masters of Environmental Law from Vermont Law School, where he graduated Magna Cum Laude. David holds a Martindale Hubbell peer reviewed and judicial rating of "AV" Preeminent. David is admitted to practice in the United States Supreme Court, the United States



Court of Federal Claims, the Fifth Circuit Court of Appeals, the Ninth Circuit Court of Appeals, and United States District Courts including Mississippi. David's broad experience includes representing parties on both sides of the bar. Before joining the firm, David was a partner with a large Jackson Mississippi defense firm, where he defended companies and insurers in complex matters, including environmental and commercial litigation. David is an active member of Lexington Rotary Club and a frequent speaker for continuing legal education.

#### **Sterling Starns**

Sterling Starns practices with Don Barrett, P.A. in Lexington, Mississippi, where she focuses on representing consumers in individual cases and class actions for personal and economic injury. Sterling currently represents a Fortune 100 Company against IBM for a failed computer project. She also represents consumers in class actions against food manufacturers which mislabel their products, as well as labor depreciation cases and talcum powder cases. Sterling also works in the area of antitrust, currently representing automobile dealers in the Automotive Parts Antitrust Litigation and numerous pharmaceutical antitrust cases. Sterling is a lifelong resident of Holmes County, Mississippi and currently resides in Lexington. Sterling also serves as Municipal Court Judge for the City of Lexington. She is past president of the Lexington Rotary Club and currently serves on the Board of Directors for the Jennifer Sterling Brown Animal Rescue of Holmes County, a local non-profit corporation.

#### **Brandi Hamilton**

Brandi R. Hamilton practices with Don Barrett, P.A. in Lexington, Mississippi, where she focuses her practice on the areas of personal injury, class actions, mass torts, antitrust, and consumer protection. As an attorney, Brandi's greatest passion is obtaining justice for those who are unable to pursue it for themselves. Brandi attended Mississippi State University and earned her baccalaureate degree in history in 2012. On an academic scholarship, Brandi then attended Mississippi College School of Law and earned her law degree in 2015. While in law school, Brandi completed the Health Law Certificate Program and earned a Certificate in Health Law in addition to her J.D. Brandi represents a diverse group of clients in civil litigation matters, and works in all stages of civil litigation from pre-trial activities through appellate practice. She currently represents numerous women injured by talcum powder products, as well as hospitals that have sustained damages as a result of the nation's opioid epidemic. A native of Vicksburg, Mississippi, Brandi moved to Lexington in 2014 and now considers it to be "home." Brandi, along with her husband Jake and their two dogs, are members of the Coxburg community. She is an active member and Vice President of the Lexington Rotary Club where she also serves as the chairperson of the club's childhood reading and literacy program. A huge animal lover and rescue advocate, Brandi currently serves on the Board of Directors for the Jennifer Sterling Brown Animal Rescue of Holmes County, a local non-profit corporation.